

Alaska Telephone Association

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President-in-Memoriam
1952 – 2008

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James Rowe
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Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Federal-State Joint Board on Universal Service, High Cost Universal Service Support, and Universal Service Contribution Methodology*, CC Docket No. 96-45, WC Docket No. 05-337, WC Docket No. 06-122

Dear Ms. Dortch:

On November 18, 2008 Greg Berberich, CEO of Matanuska Telephone Association, and I met separately with Scott Deutchman, Daniel Gonzalez, Commissioner McDowell and Nick Alexander, and Commissioner Tate and Greg Orlando. The following day Mr. Berberich and I met with Scott Bergmann. In each of the meetings we discussed the proposals released on Universal Service and Intercarrier Compensation by the Commission on November 5, 2008. Respecting the complexity of the issues, we supported the temporary exemption of Alaska and Hawaii from the changes in disbursement of high-cost universal service support while the impact of changes on the less fragile communications environments of the Lower 48 are evaluated. Although we spoke in favor of the exempted status, we noted that the identical support rule should not remain in effect indefinitely and we expressed concern that a broadband standard that did not apply to the non-contiguous states could result in our citizens being left without comparable access. Additionally, we pleaded for action by the Commission to provide some guidance for rural rate-of-return carriers so they will understand what levels of service they are expected to provide and what revenue streams they might anticipate to fund those services.

Sincerely,



Jim Rowe

cc: Commissioner McDowell
Commissioner Tate
Daniel Gonzalez
Nick Alexander
Scott Bergmann
Scott Deutchman
Greg Orlando